

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA

v

KAITLYN MARIE HAMMOND
Defendant

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Case No. 1:24-mj-33

MOTION FOR REVIEW AND REVOCATION OF DETENTION ORDER

Kaitlyn Marie Hammond by and through counsel, John O. Iweanoge II and THE IWEANOGES FIRM, PC hereby moves to vacate the Magistrate Judge's February 8, 2024 Detention Order, and requests a hearing pursuant to 18 U.S.C. §3145(b) and Fed. R. Crim. P. 58(g)(2).

That contrary to Pre-Trial Services Agency report and recommendation for release to a 3rd party custodian, the Magistrate Judge found, *inter alia*, that Kaitlyn Marie Hammond had not rebutted the presumption under 18 U.S.C section 3142. Kaitlyn Marie Hammond seeks a hearing, reviewing this order where she can establish her ties to the community and a suitable third party custodian, which far outweigh any concern over flight and/or danger to the community,

Ms. Hammond will file a Memorandum of Law, Facts, and Authorities upon the issuance of a memorandum opinion by the Magistrate Judge or receipt of the detention hearing transcript.

Respectfully submitted,

THE IWEANOGES FIRM, PC

.../S/JohnOIweanogeII/S/.....

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REQUEST FOR A HEARING

Pursuant to Local Rules of the United States District Court for the Eastern District of Virginia, Ms. Hammond respectfully requests a hearing on this motion filed herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of February 2024, this Motion for review and revocation of detention order was filed with the Clerk of Court through the Court's Electronic Filing System (ECF) which will send notification (NEF) constituting service to all interested parties and attorneys of record.

/s/JohnOIweanoge/s/.....
John O. Iweanoge II